

DeafBlind Citizens in Action

June 29, 2018

Consumer & Government Affairs Bureau
Federal Communications Commission
445 12th St SW
Washington, DC 20554

RE: Public Notice Comments – Accessibility of Communications Technology (CG 10-213)

DeafBlind Citizens in Action (DBCA) is honored to submit the following comments to the Federal Communications Commission (FCC) public notice for comment on the 2018 21st Century Communications and Video accessibility Act (CVAA) Biennial Report to Congress.

DBCA's vision is to create a better world where deafblind individuals are empowered through equal opportunities to live fully and productively including full access to employment, education, and technology. The use of technology is critical to the success of individuals, including those who are deafblind. DBCA is pleased to have provided input on previous proceedings and to be involved in the FCC's Disability Advisory Committee (DAC).

As the FCC is aware, the communication needs of people who are deafblind are varied and complex. DBCA makes the following comments regarding those needs:

- A person who is profoundly deafblind with no knowledge of braille and who communicates through tactile ASL has no mechanism for placing or receiving a call on any type of equipment, including mobile devices. To date, no equipment has become available that can communicate tactile ASL without the physical presence of a communication facilitator (a live interpreter or SSP).
- The unique needs of a deafblind person may require additional time to make selections from an automated menu. The system often out when trying to make selections, even for a deafblind person skilled in the use of adaptive technology.
- Emergency situations are of concern for all citizens, and especially so for people who are deafblind. For a person who is deafblind with no knowledge of braille, it is impossible. Providing emergency personnel with information and location in the event of a 911 call is critical in the lives of everyone.
- Advances in technologies frequently do not consider the needs of people who are deafblind. In recent redesigns of popular mobile technology, ports and home buttons have been removed, creating a very difficult accessibility barrier for this population. The removal of ports precludes listening with optimized direct hearing devices and charging simultaneously.
- When entering a retail establishment to obtain a piece of new mobile technology, there is no access to communication on site. User guides and other documentation continue to be inaccessible to those who are deafblind. Furthermore, this equipment will require setup by someone other than the deafblind customer.

DBCA appreciates the opportunity to provide feedback on the upcoming 2018 CVAA Biennial Report to Congress. For any clarification, please contact me directly at george.stern.stern@ttu.edu, or (954) 591-5978.

Sincerely,
George Stern
Vice President, DBCA